

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

Gawker Media, LLC, *et al.*,

Debtor

Chapter 11

Case No. 16-11700 (SMB)
Jointly Administered

Gawker Media, LLC,

Plaintiff,

v.

Meanith Huon, Ashley Terrill, Teresa Thomas,
Shiva Ayyadurai, Terry Bollea, Charles C.
Johnson, and Got News LLC,

Defendants.

Adv. Proc. No. 16-ap-1085

**DEFENDANT TERRY BOLLEA'S
FIRST REQUEST TO PLAINTIFF FOR PRODUCTION OF DOCUMENTS**

TO: PLAINTIFF AND ITS COUNSEL OF RECORD

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, made applicable to this proceeding by Rule 7034 of the Federal Rules of Bankruptcy Procedure, Defendant Terry Bollea by and through his undersigned counsel, hereby request that Plaintiff Gawker Media, LLC produce all documents described below for inspection and copying by June 24, 2016 at 12:00 pm.

DOCUMENTS TO BE PRODUCED

1. All documents relied on or referred to in the papers filed in support of Debtor's Motion for (I) a Preliminary Injunction and/or (II) Extension of the Automatic Stay (the "Motion") filed with the Bankruptcy Court for the Southern District of New York on June 10,

2016, including, but not limited to, (a) the Indemnity Agreement, dated as of December 31, 2009, by and between Gawker Media Group, Inc. (“GMGI”) and Nick Denton, (b) the Fourth Amended and Restated Memorandum and Articles of Association of GMGI; and (c) the Second Amended and Restated Operating Agreement of Gawker Media, dated as of August 21, 2012, each of which are referenced in Paragraph 22 of the Declaration of William D. Holden in support of the Debtor’s Motion dated June 10, 2016 and Paragraph 38 of the Memorandum of Law in Support of the Motion.

2. Amendment No. 3 to the Operating Agreement of Gawker Media, LLC, dated as of June 7, 2016 and referenced on page 5 of Debtor’s Voluntary Petition for Non-Individuals Filing for Bankruptcy filed on June 10, 2016 with the Bankruptcy Court for the Southern District of New York (the “Petition”).

3. The Operating Agreement of Gawker Media LLC.

4. All documents evidencing agreements between Debtor and William D. Holden and/or Opportune, LLP, including, but not limited to, the “Operating Services Agreement” referenced on page 9 of the Petition.

5. All documents evidencing agreements between Debtor and Houlihan Lokey Capital, Inc. (“Houlihan”), including, but not limited to, the “HL Services Agreement” referenced on page 9 of the Petition.

6. All other documents on which Debtor intends to rely during the evidentiary hearing on the Motion.

7. An electronic and/or hard copy of any calendar maintained by or for Nick Denton for each month from March through September 2016.

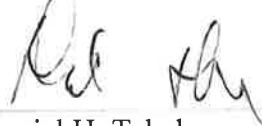
8. Any indemnification agreements between A.J. Daulerio and Debtor, GMGI and/or Kinja, Kft.

9. Communications, proposals, offers, term sheets and similar materials exchanged between Houlihan and the “six potential stalking horse bidders,” referenced in paragraph 13 of the Motion to Authorize Bidding Procedures (Dkt. No. 21).

10. The Consulting Agreement between the Stalking Horse Bidder and Nick Denton, dated June 10, 2016, referenced in paragraph 29(a) of the Motion to Authorize Bidding Procedures (Dkt. No. 21).

Dated: New York, New York
June 17, 2016

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